

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**COMMONWEALTH OF PUERTO RICO,
et al.,**

Defendants.

CIVIL NO. 12-2039 (GAG)

MOTION FOR A BRIEF CONTINUANCE OF MEETING WITH SPECIAL MASTER

TO THE HONORABLE COURT:

COMES NOW Defendants Commonwealth of Puerto Rico and Puerto Rico Police Department (“Defendants”), by and through the undersigned counsel, and respectfully state and pray as follows:

1. On December 4, 2018, the Court issued an order appointing Dr. Alejandro Del Carmen to serve as Special Master (“SM”) to the Court pursuant to Fed. R. Civ. P. 53. D.E. 1038.
2. On January 14, 2019, the Court entered a Restricted Order, which informed the parties that the SM would be in Puerto Rico this Thursday, January 17, 2019. D.E. 1072. The Court instructed the defendants to meet with the SM at 9:00 am that day to “discuss areas within the data gathering process that may be preliminarily identified for him to work on.” D.E. 1072.
3. On January 15, 2019, the Court entered a further Restricted Order¹ establishing that the meeting with the SM would be held at 9:30 AM on January 17, 2019 at the Clemente Ruiz Nazario US Courthouse. D.E. 1074.

¹ The restriction placed on both orders has since been lifted. D.E. 1077.

4. However, at that time, the undersigned attorneys are unavailable to attend the meeting due to previously-scheduled hearings in the US District Court. Specifically, counsel must appear before the Hon. Pedro Delgado at 9:00 AM for a status conference in criminal case 17-132 (PAD). Subsequently, counsel must appear before the Hon. Daniel R. Dominguez at 10:00 AM for a status conference in criminal case 18-325 (DRD).²

5. Similarly, counsel from the PRDOJ is unable to attend the meeting as scheduled, due to a previously scheduled meeting between the parties in civil case number 16-2849 (GAG).

6. Accordingly, Defendants request a brief continuance of the January 17, 2019 meeting to a time after 10:30 AM. The continuance would serve to accommodate counsel's prior professional commitments without foregoing the meeting with the SM.

7. This request is made in good faith and with no intention to delay proceedings in this case.

WHEREFORE, Defendants respectfully requests the Court **GRANT** this motion and enter an order continuing the January 17, 2019 meeting to a time after 10:30 AM.

RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY: That today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico, using the CM/ECF system which will send a copy and notification of filing to all counsel of record.

In San Juan, Puerto Rico, this 16th day of January, 2019.

By:

s/ Maria A. Dominguez
Maria A. Dominguez
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s/ Arturo J. Garcia Sola
Arturo J. Garcia Sola
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² Judge Dominguez's hearings will be held at the Hato Rey Courthouse.

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s/ Javier Micheo Marcial

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